

dated August 5, 2015, the Declaration of Gregory T. Casamento dated August 6, 2015, and the exhibits thereto, the undersigned, on behalf of Defendants HSBC Holdings plc, HSBC Bank plc, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Securities plc, Société Générale, Sumitomo Mitsui Banking Corporation, Mizuho Corporate Bank, Ltd., and Deutsche Bank AG hereby move this Court for an order: (1) sustaining Defendants' objections to Plaintiffs' First Request for Production of Documents based on the data privacy laws of the United Kingdom; (2) requiring Plaintiff to pursue discovery of documents located or processed in the United Kingdom and subject to United Kingdom law through the procedures set forth in the Hague Convention; and (3) providing for such other and further relief that the Court deems proper.

Dated: August 6, 2015
New York, New York

Respectfully submitted,

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